

Exhibit D

DOCUMENT REQUESTS COMMON TO ALL THIRD PARTIES

1. All Documents Identifying Any investment Criteria, and Any changes to that Criteria, used to evaluate Your investments in oil and gas companies generally, and ExxonMobil specifically—including Any assessment of risk Concerning **(i)** the purchase, retention, redemption, and sale of such securities, and **(ii)** climate change or potential future climate change regulations.
2. All Documents Concerning Your oil and gas holdings generally, and those of ExxonMobil specifically.
3. All Documents Concerning whether oil and gas companies use costs akin to Proxy Costs and GHG Costs, how such costs are used, at what level these distinct costs are set, and how these distinct costs influence investment decisions.
4. All Documents Concerning Disclosures by ExxonMobil regarding: **(i)** Proxy Costs; **(ii)** GHG Costs; **(iii)** Stranded Assets; and **(iv)** the graph referenced in Complaint paragraph 293 entitled “Substantial Costs for CO2 Mitigation.”
5. All Documents Concerning Any of the following ExxonMobil publications: **(i)** *Energy and Carbon: Managing the Risks* (2014); **(ii)** *Energy and Climate* (2014); **(iii)** responses to annual questionnaires from CDP (formerly known as the Carbon Disclosure Project); and **(iv)** *Energy and Carbon Summary* (2016).
6. All Communications between You and the Attorney General Concerning **(i)** Any investigation into ExxonMobil conducted by the Attorney General, **(ii)** Any actual or contemplated legal action Concerning ExxonMobil, or **(iii)** climate change.
7. All Communications Concerning ExxonMobil between You and Matthew Pawa, Peter Frumhoff, Naomi Oreskes, Geoffrey Supran, the Rockefeller Family Foundation, Sharon Eubanks, Hagens Berman Sobol Shapiro LLP, Richard Heede, Sher Edling LLP, 350.org, or the Union of Concerned Scientists.